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19 *Attorneys for Defendants Broadcom Inc., Broadcom  
20 Corporation and Avago Technologies International  
21 Sales Pte. Limited*

22 [Additional Counsel on Signature Page]

23  
24 UNITED STATES DISTRICT COURT  
25 NORTHERN DISTRICT OF CALIFORNIA  
26 SAN FRANCISCO DIVISION

27 SAMSUNG ELECTRONICS CO., LTD.

28 Plaintiffs,

v.

BROADCOM INC., BROADCOM  
CORPORATION, AND AVAGO  
TECHNOLOGIES INTERNATIONAL  
SALES PTE. LIMITED,

Defendant.

CASE NO. 3:24-cv-03959-LB

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANTS  
BROADCOM INC., BROADCOM  
CORPORATION, AND AVAGO  
TECHNOLOGIES INTERNATIONAL  
SALES PTE. LIMITED TO RESPOND  
TO THE COMPLAINT PURSUANT  
TO CIVIL LOCAL RULE 6-1(A)**

1 Plaintiff Samsung Electronics Co., Ltd. (“Plaintiff”) and Defendants Broadcom Inc.,  
2 Broadcom Corporation, and Avago Technologies International Sales Pte. Limited (“Defendants”)  
3 and, together with Plaintiffs, the “Parties”), by and through their respective attorneys of record  
4 herein and without waiving any rights, claims, or defenses they have in this action, enter into this  
5 Stipulation pursuant to Civil Local Rule 6-1(a), with reference to the following circumstances:

6 WHEREAS, Plaintiffs filed the Complaint on July 1, 2024 (ECF No. 1);

7 WHEREAS, Plaintiffs purported to have served Defendants with a copies of the Summons  
8 and Complaint on July 3, 2024 (ECF Nos. 7–9);

9 WHEREAS, Defendants’ response to the Complaint is currently due on July 24, 2024;

10 WHEREAS, Defendants are evaluating their response to the Complaint and require  
11 additional time for their response;

12 WHEREAS, counsel for the Parties conferred telephonically and by email and have agreed  
13 to extend Defendants’ deadline to respond to the Complaint to August 28, 2024;

14 WHEREAS, the stipulated extension of Defendants’ response deadline to the Complaint  
15 will not affect any deadlines currently set by the Court or other applicable rules;

16 WHEREAS, the Parties have not previously stipulated to any extensions of time;

17 WHEREAS, the Parties agree that nothing in this Stipulation shall be construed as a waiver  
18 of any Party’s rights or positions in law or in equity and that all Parties expressly reserve and do  
19 not waive arguments or defenses that Party would otherwise have as of the date of this Stipulation.

20 NOW THEREFORE, the Parties, through their respective attorneys of record, hereby  
21 stipulate and agree to extend Defendants’ deadline to respond to the Complaint to August 28, 2024.

22 **IT IS SO STIPULATED.**

23  
24 [Signatures on following page]  
25  
26  
27  
28

1 Dated: July 23, 2024

LATHAM & WATKINS LLP  
By: /s/ Belinda S Lee  
Belinda S Lee

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12 *Attorneys for Defendants Broadcom Inc.,*  
13 *Broadcom Corporation and Avago Technologies*  
14 *International Sales Pte. Limited*

15 Dated: July 23, 2024

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16 By: /s/ Douglas A. Winthrop  
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27 *Attorneys for Plaintiff Samsung Electronics Co.,*  
28 *Ltd.*

## **ATTESTATION**

I am the ECF user whose identification and password are being used to file the foregoing  
Stipulation for Extension of Time for Defendants Broadcom Inc., Broadcom Corporation, and  
Avago Technologies International Sales Pte. Limited to Respond to the Complaint Pursuant to  
Civil Local Rule 6-1(a). Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories  
listed, and on whose behalf the filing is submitted, concur in this filing's content and have  
authorized such filing.

9 | Dated: July 23, 2024

/s/ *Belinda S Lee*

Belinda S Lee